

# Exhibit A



U.S. Department of Justice

Federal Bureau of Investigation

Washington, DC 20535

May 5, 2015

Certified, Return Receipt

Mr. Teofil Brank, Prisoner ID No. 68794-112  
Metropolitan Detention Center  
Post Office Box 1500  
Terminal Annex  
Los Angeles, CA 90053-1500

Dear Mr. Brank:

**Factual and Legal Basis for Seizure**

On March 6, 2015, property was seized by the Federal Bureau of Investigation (FBI) at Los Angeles, California for forfeiture for violation of PROCEEDS OF A SPECIFIED UNLAWFUL ACTIVITY. The property is described as follows:

\$445,762.50 in total funds from Wells Fargo Bank Account Numbers: 2977086764 (\$395,762.50) and 1110872536 (\$50,000.00) held in the name of Teofil Brank aka Toefil Brank at Wells Fargo Bank, Los Angeles, CA. (See Attached List)

Asset ID Number : 15-FBI-002564

Seizure Number : 3410150099

This forfeiture is being conducted pursuant to Title 18, United States Code (U.S.C.), Section 981(a)(1)(C) and the following additional federal laws: 19 U.S.C. Sections 1602-1619, 18 U.S.C. Section 983, and 28 Code of Federal Regulations (C.F.R.) Part 8.

You may contest the seizure and forfeiture of this property and/or petition to the FBI and request a pardon of the forfeited property.

**To Contest the Forfeiture**

If you want to contest the seizure or forfeiture of the property in court, you must file a claim of ownership with the FBI by June 9, 2015. The claim is filed when it is received by the FBI Forfeiture Paralegal Specialist of the FBI Field Division mentioned below. The claim need not be made in any particular form. The claim shall identify the specific property being claimed and state the claimant's interest in such property. Documentary evidence supporting the claimant's interest in the property may help substantiate the claim, but is not required. The claim must be made under oath by the claimant, not counsel for the claimant, and must recite that it is made under penalty of perjury, consistent with the requirements of 28 U.S.C. 1746. An acknowledgement, attestation, or certification by a notary public alone is insufficient. A frivolous claim may subject the claimant to a civil fine equal to ten (10) percent of the value of the forfeited property but in no event shall the fine be less than \$250 or greater than \$5,000.

If you wish to contest the forfeiture of the asset, you must comply with the procedures set forth herein. Failure to do so will waive your right to contest the forfeiture of the asset in this proceeding and any judicial proceeding - either civil or criminal - even if such a proceeding has already been commenced or is commenced in the future.

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**To Request Release of the Property**

Upon the filing of a claim, a claimant, pursuant to 18 U.S.C. Section 983 (f) and 28 C.F.R. Section 8.15, may request release of the seized property during pendency of forfeiture proceedings due to hardship. The request must be made in writing and establish that the claimant has a possessory interest in the property, that the claimant has sufficient ties to the community to provide assurances that the property will be available at the time of trial, and that the continued possession by the Government will cause a substantial hardship to the claimant and that this hardship outweighs the risk that the property will be destroyed, damaged, lost, concealed, or transferred. **Property not subject to release under this provision includes: contraband, any property, the possession of which by the claimant, petitioner, or the person from whom it was seized is prohibited by state or Federal law, currency, or other monetary instrument, or electronic funds unless such currency or other monetary instrument or electronic funds constitutes the assets of a legitimate business; property to be used as evidence of a violation of law; property by reason of design or other characteristic is particularly suited for use in illegal activities; or property likely to be used to commit additional criminal acts if returned to the claimant.**

**To Request a Pardon of the Property**

In addition to or in lieu of filing a claim, if you want to request a pardon of the forfeited property, submit a petition for remission or mitigation of the forfeiture to the FBI Field Division identified below. The petition must include proof of your ownership interest in the property or proof that you were a victim of the offense underlying the pending forfeiture, or a related offense, and the facts and circumstances which you believe justify a return of the property, a return of your interest in the property, or a return of part of the property. For the regulations pertaining to remission or mitigation for the forfeiture see 28 C.F.R. Sections 9.1-9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). You should file the petition within thirty (30) days following the receipt of this notice of seizure and intent to forfeit. The Ruling Official for all petitions for remission or mitigation in administrative forfeiture cases is the Forfeiture Counsel, who is the Unit Chief, Legal Forfeiture Unit, Office of the General Counsel, Federal Bureau of Investigation. The Ruling Official for all petitions for remission or mitigation in judicial forfeiture cases is the Chief, Asset Forfeiture and Money Laundering Section, Criminal Division, Department of Justice.

**Where to Submit Correspondence**

The Asset ID 15-FBI-002564 and Seizure Number 3410150099 have been assigned to this forfeiture action. Use these numbers to identify the property when submitting a claim, petition, or other correspondence to the FBI.

Submit all documents to this FBI Field Division:

FEDERAL BUREAU OF INVESTIGATION  
ATTENTION: FORFEITURE PARALEGAL SPECIALIST  
11000 WILSHIRE BLVD.

SUITE 1700, FOB  
LOS ANGELES, CA 90024

TELEPHONE NUMBER: 818-989-9632

Sincerely,

*Matthew S. Rasnake*

Matthew S. Rasnake  
Unit Chief  
Forfeiture and Seized Property Unit  
Finance Division

## NOTE:

All telephone inquiries should be directed to the aforementioned FBI Field Division to the attention of the Forfeiture Paralegal Specialist. Please do not send any written correspondence to Matthew S. Rasnake.